

CES Environmental Services, Inc. (As of February 13, 2015)

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on site.

As of February 13, 2015, the EPA Team has addressed the following:

- Vacuum Boxes (original): Wastes contained in the original 12 vacuum boxes have been transferred into DOT vacuum boxes and sent for disposal (Trustee addressed 2 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee gave boxes to C4 Environmental if they paid for cleaning and provided them with cleaning certificates). **(COMPLETED)**
- Roll-Off Boxes (original): Wastes contained in original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off box containers have been removed from the site (Trustee gave boxes to C4 Environmental if they paid for cleaning and provided them with cleaning certificates). **(COMPLETED)**
- Frac Tanks (original): Waste removed from the 8 of 12 frac tanks (3 of 12 were originally empty). Wastes in 1 of the original frac tanks (FT1004) has not been addressed as the disposal company is unable to receive the waste due to odor. On-site treatment with off-site disposal for the material is expected in late February or early March. 4 emptied frac tanks have been released to the owners (1 to Dynamic Rental, 3 to Dana Transport). The remaining frac tanks will remain on-site for anticipated cleanup operation waste storage (4 CES, 4 Dana Transport).
- Aboveground Storage Tanks (ASTs): Liquids and sludge have been removed from 18 of 20 Steel ASTs. 2 Steel ASTs and 3 Poly Tanks remain to be addressed. The 2 Steel ASTs are awaiting disposal facility waste acceptance and sludge removal. The 3 Poly Tanks will be addressed with the drums/totes/miscellaneous containers.
- Waste Water Treatment Tanks (WWTT): Liquids have been removed from 12 of 20 WWTTs (2 of 20 are empty). 2 of the 20 contained only sludge. 4 of the 20 tanks with liquids will be handled with the drums/totes/miscellaneous containers. Sludge removal from the WWTT's expected to begin the week of February 16. Initial liquid/solids removal within the secondary containment for the WWTT's has been substantially completed but will require additional and periodic cleanup due to rainfall into the building as well as drips/leaks from cleanup operations.
- Totes/Drums/Vats/Misc Containers: Empty containers have been segregated for cleaning (pressure washing). Full/Partially Full containers have been sampled, field characterized and currently being segregated into appropriate waste streams to be bulked, sampled, and properly containerized for disposal. There are approximately 8 poly tanks, 2 Vats, and 150 totes/drums with materials to be addressed. Additionally, there are approximately 166 RCRA empty totes/drums to be addressed.
- Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing sheens has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is causing a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.
- Loading Bays (Main Warehouse): The bays and warehouse trenches have been cleared of debris and chemical wastes to the extent possible;
- Cleaning Bay (Truck Cleaning Area): The bays have been cleaned and sludge removed from trenches leading to sump. This area will be used for container cleaning activities, as necessary.

- Storm Water Management: This activity continues as rainfall occurs. Storm water is being allowed to drain from the site through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site usually inundated with storm water during a rain event. A one inch rainfall adds approximately 180,000 gallons of water on the facility where 60000 drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. Eventually, this will be opened up to allow normal storm water runoff to occur. The City of Houston sanitary sewer currently remains an option for questionable storm water issues should the need arise.
- Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility.
- Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed; **(COMPLETED)**
- Bulk Process Chemicals: Trustee collected and disposed; **(COMPLETED)**

EPA Generated Cleanup Wastes/Containers Located On-Site:

Roll-Off Boxes:

Number	Status
OT 25563	Sand Trench Residue
OT 25480	Fine material, soil sand from North Pond Asphalt
OT 25160	Sand from Warehouse
OT 25452	Sand from Warehouse
OT 25319	Debris (ADS Hose, Wood,Pails, Plastic, PPE)
OT 25134	Debris (Pails, PPE, Wood)
OT 25337	Empty
OT 25474	Empty

Vacuum Boxes:

Number	Status
VB 2564	Sludge from WWT Area
VB 25318	Sludge S T 2
VB 25306	Sludge S T 2, S T 5
VB 25302	Sludge N T 3, N T 5, N T 6, S T 8
VB 2501	Sludge N T 3, N T 5, N T 6, S T 8
VB 25278	Sludge N T 9, N T 10, N T 11
VB 25226	Sludge S T 3, S T 5, S T 7
VB 25348	Sludge S T 5
VB A 0825097	Sludge ST 5
VB A 785	Sludge ST 5

VB 25206	Sludge ST 5
VB 25274	Sludge ST 5
VB 25341	Sludge ST 8
VB 25251	Sludge ST 8
VB 25322	Sludge ST 8
VB 25287	Sludge NT7
VB 25333	Sludge NT8
VBDW 25196	Sludge NT8
VB 25146	Empty
VB 25281	Empty
VB 25343	Empty
VB 25315	Empty

Frac Tanks:

Number	Status
FT 1001	Full (Approved for Disposal)
FT 1004	Full (Finalizing Approvals Treatment/Disposal)
FT 1002	Empty (Will be used as Treatment Tank for FT1004)
FT 215012	Full (Analysis Pending)
FT 30335	5,060 Gallons
FT 5180	Empty (Some residual sludge)
FT 33527	Empty-Cleaned
FT 30338	Empty-Cleaned

Activities Remaining:

- AST Liquid/Sludge Removal and Disposal: ST1, ST6
- Waste Water Treatment Tank Sludge Removal and Disposal: T1,T3-T13 (appx. 6000 gallons)
- Sumps: Remove/Dispose Liquids/Sludges from sumps in Cleaning Bay, Shed, Former Shed Area
- Secondary Containments: Remove/ Dispose of liquids/sludges/sand from AST North and South Containments and Waste Water Containment
- Vacuum Boxes/Rolloff Boxes/Frac Tanks: Remove/Dispose of cleanup generated wastes;
- Totes/Drums/Vats/Misc Containers: Bulk/Dispose of chemicals
- Totes/Drums/Vats/Misc Containers: Clean/Dispose (Low Priority)
- Pressure Wash Clean Exterior stained Asphalt/Concrete Area (Low Priority)
- Pressure Wash Clean Interior stained Asphalt/Concrete Areas (Low Priority)
- Excavate stained soils (Low Priority)

EPA Cleanup Costs (Contractor) as of 2/6/15: \$ 1,038,994/\$2,000,000